

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

**Supplement Manufacturing
Partner, Inc. d/b/a SMP Nutra,**

Plaintiff;

v.

William Cartwright,

Defendant.

Case No. 2:23-cv-06585-JMA-AYS

**SUPPLEMENTAL
DECLARATION OF
BRITTANY MILANO**

I, BRITTANY MILANO, declare as follows:

1. I am an Insurance Specialist at MB Agency LLC (“MB Agency”). I am over 18 years old and not a party to this lawsuit. I provide this declaration based on my personal knowledge of the events described herein, and documents and records created and maintained by MB Agency during its ordinary course of business. If called as a witness, I can testify to the truth of the statements below.
2. On December 12 and 30, 2023, MB Agency received solicitation emails from “Top Tier Nutra” (“Top Tier”) at the email address: brittany@mbinsure.com (“MB Milano Email”).
3. On December 7, 12, and 30, 2023, MB Agency received similar solicitation emails from Top Tier at another address: admin@mbinsure.com (“MB Admin Email”). Each of these emails begins with the salutation, “Hello MB” or “Hi MB,” and copies are attached hereto as **Exhibit 1**.
4. The MB Admin Email is used by MB Agency’s virtual assistant located in the Philippines. This address is not listed on the MB Agency website, nor is it an email

that I or anyone would have provided for the purpose of soliciting business. It is only used in internal communications and communications with existing customers. The company's public address, listed on its website, is staff@mbinsure.com

5. I have never provided the MB Milano Email or MB Admin Email to Robert Zorn. He is not, and has never been, an MB Agency customer.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 26, 2024
Saint James, New York

DocuSigned by:

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Brittany Milano